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Attorney for Toniquewa Ballard

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

V.

TONIQUEWA BALLARD,

Defendant.

Case No. 2:15-cr-195-GMN-CWH

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Robert Kneif, Assistant United States Attorney, counsel for the United States of America, and Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Toniquewa Ballard, that the employment condition of Ms. Ballard's pre-trial release be modified to allow her the option of participating in educational programs in lieu of seeking employment.

This Stipulation is entered into for the following reasons:

1. On August 3, 2015, the Court released Ms. Ballard on a personal
recognition bond. (*See Minutes of Proceedings (#20).*) Among the conditions imposed,

1 the Court ordered that the Defendant shall maintain or seek employment. (See PR Bond
2 at 3 -4 (#21).)

3 2. On August 25, 2015, Ms. Ballard's Pretrial Services officer contacted
4 undersigned counsel, alerting undersigned counsel that Ms. Ballard has not yet obtained
5 her general equivalency diploma (GED). Pretrial Services suggested that the parties
6 request that Ms. Ballard's employment condition be modified to include the clause "and/or
7 participate in an educational program." Modification of this condition to include the above
8 language will allow Ms. Ballard to obtain her GED and pursue other educational
9 programs with the time that she would otherwise be required to devote to finding
10 employment.

11 3. The parties and Pretrial Services believe that allowing Ms. Ballard to obtain
12 her GED and further her education in lieu of seeking employment will assist Ms. Ballard
13 with finding employment at a future date as most companies require a GED.

14 DATED this 26th day of August, 2015

15 RENE L. VALLADARES
16 Federal Public Defender

17 By: */s/ Heidi A. Ojeda*
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19 HEIDI A. OJEDA
20 Assistant Federal Public Defender

21 DANIEL G. BOGDEN
22 United States of America

23 By: */s/ Robert Knief*
24 _____
25 ROBERT KNIEF
26 Assistant United States Attorney

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2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 TONIQUEWA BALLARD,

8 Defendant.

9 Case No. 2:15-cr-195-GMN-CWH

ORDER

ORDER

10 **IT IS THEREFORE ORDERED**, that Ms. Ballard's employment condition shall be
11 modified to the following: The defendant shall maintain or actively seek lawful and
12 verifiable employment and/or participate in an educational program, and shall notify
13 Pretrial Services or the supervising officer prior to any change.

14 DATED: August 27, 2015

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20 UNITED STATES MAGISTRATE JUDGE
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